

## **EXHIBIT 6**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division**

**ePLUS INC.,** )  
                        )  
                        )  
                        )     **Civil Action No. 2:09cv232**  
**Plaintiff,**       )  
                        )  
                        )  
                        )  
**v.**                   )  
                        )  
                        )  
**PERFECT COMMERCE, INC.,**       )  
**SCIQUEST, INC., LAWSON**       )  
**SOFTWARE, INC. AND VERIAN**      )  
**TECHNOLOGIES, INC.**            )  
                        )  
**Defendants.**        )

**PLAINTIFF ePLUS INC.'S FIRST SET OF INTERROGATORIES  
TO DEFENDANT LAWSON SOFTWARE, INC.**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff ePlus inc., (“ePlus”), hereby requests that, within thirty (30) days of the date of service of these interrogatories, and in accordance with the following definitions and instructions, Defendant Lawson Software, Inc. (“Lawson”) answer separately, in writing, and under oath, by an officer or duly authorized agent of Lawson, the following interrogatories.

The following interrogatories are continuing, and Lawson must promptly supplement its answers in accordance with Federal Rule 26 as additional or corrected information comes to its attention and that of its attorneys.

**DEFINITIONS**

1.     The definitions contained herein, unless provided otherwise, apply to all discovery requests, including subsequent discovery requests.

Service(s) (including without limitation revenues derived from licensing, maintaining, or servicing such system(s)), for each month from its inception of operations to the present, including, without limitation, the names of any clients or advertisers, the total revenue derived from each and the rates charged, the numbers of transactions, and the amounts derived from any licensing fees, and transaction-based fees collected in connection with its Electronic Sourcing and Procurement System(s) and/or Service(s).

**Interrogatory No. 11.**

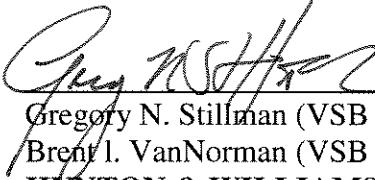
State with particularity the date(s) of conception of Lawson's Electronic Sourcing and Procurement System(s) and/or Services, or any process, system, apparatus, and device used by Lawson in connection with Lawson's Electronic Sourcing and Procurement System(s) and/or Services, and describe in detail the activities undertaken by Lawson, or its predecessors, to reduce those conceptions to practice.

**Interrogatory No. 12.**

Describe in detail the occasion(s) upon which Lawson first became aware of or received notice(s) in any manner of each of the patents in suit, including any applications that matured into the patents in suit and the subsequent issuance of those patents, including without limitation the dates and the persons involved in learning of the patent(s) or receiving the notice(s), and state in detail all steps taken by Lawson in response to such notice(s), including without limitation any analyses of infringement or noninfringement, validity or invalidity, or enforceability or unenforceability of the patents in suit, and any advice of counsel obtained relating to the patents in suit.

Respectfully submitted,

Date: July 24, 2009

  
\_\_\_\_\_  
Gregory N. Stillman (VSB #14308)

Brent I. VanNorman (VSB #45956)

**HUNTON & WILLIAMS LLP**

500 East Main Street

Suite 1000

Norfolk, VA 23510

Telephone: (757) 640-5300

Facsimile: (757) 625-7720

gstillman@hunton.com

bvannorman@hunton.com

Scott L. Robertson (*admitted pro hac vice*)

Jennifer A. Albert (*admitted pro hac vice*)

David M. Young (VSB #35997)

Robert D. Spendlove (VSB #75468)

**GOODWIN PROCTER LLP**

901 New York Avenue, N.W.

Washington, DC 20001

Telephone: (202) 346-4000

Facsimile: (202) 346-4444

srobertson@goodwinprocter.com

jalbert@goodwinprocter.com

dyoung@goodwinprocter.com

rspendlove@goodwinprocter.com

Shirley Sperling Paley

(*pro hac vice application pending*)

James D. Clements

(*pro hac vice application pending*)

**GOODWIN PROCTER LLP**

Exchange Place

53 State Street

Boston, MA 02109-2881

Telephone: (617) 570-1000

Facsimile: (617) 523-1231

spaley@goodwinprocter.com

jcllements@goodwinprocter.com

Attorneys for Plaintiff ePlus inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24<sup>th</sup> day of July, 2009, I will serve **Plaintiff ePlus Inc.'s First Set of Interrogatories to Defendant Lawson Software, Inc.**, on the following counsel of record,

*via hand delivery:*

Stephen E. Noona (VSB #25367)  
Kaufman & Canoles, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3289  
Facsimile: (757) 624-3169  
senoona@kaufcan.com

*Counsel for Defendant Perfect Commerce, LLC,  
SciQuest, Inc. and Lawson Software, Inc.*

*via electronic mail and regular mail:*

James J. Briody (VSB 32128)  
Sutherland Asbill & Brennan LLP  
1275 Pennsylvania Ave., NW  
Washington, DC 20004-2415  
Telephone: (202) 383-0100  
Facsimile: (202) 637-3593  
jim.briody@sablaw.com

*Counsel for Verian Technologies, Inc.*

George E. Kostel (VSB 34757)  
Nelson Mullins Riley & Scarborough, LLP  
101 Constitution Avenue, NW Suite 900  
Washington, DC 20001  
Telephone: (202) 712-2800  
Facsimile: (202) 712-2862  
george.kostel@nelsonmullins.com

*Counsel for Verian Technologies, Inc.*

Daniel Johnson, Jr. (*admitted pro hac vice*)

Rita E. Tautkus (*admitted pro hac vice*)

Morgan, Lewis & Bockius, LLP

One Market, Spear Street Tower

San Francisco, CA 94105-1596

Telephone: (415) 442-1392

Facsimile: (415) 442-1001

djohnson@morganlewis.com

rtautkus@morganlewis.com

*Counsel for Defendants SciQuest, Inc. and*

*Lawson Software, Inc.*

Robert W. Busby, Jr. (VSB #41312) (*admitted pro hac vice*)

Bradford A. Cangro (*admitted pro hac vice*)

Morgan, Lewis & Bockius LLP

1111 Pennsylvania Ave., NW

Washington, DC 20004-2541

Telephone: (202) 739-5970

Facsimile: (202) 739-30001

rbusby@morganlewis.com

bcangro@morganlewis.com

*Counsel for Defendants SciQuest, Inc. and*

*Lawson Software, Inc.*

Kenneth W. Brothers (*pro hac vice application pending*)

Matthew J. Ricciardi (*pro hac vice application pending*)

Dickstein, Shapiro LLP

1825 Eye Street, NW

Washington, DC 20006-5403

Telephone: (202) 420-4128

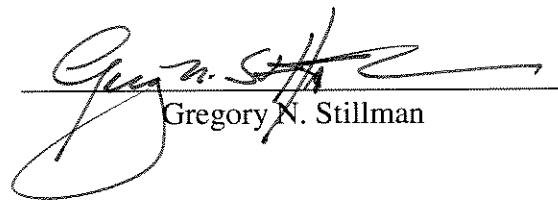
Facsimile: (202) 420-2201

brothersk@ dicksteinshapiro.com

ricciardim@ dicksteinshapiro.com

*Counsel for Defendant Perfect Commerce, LLC*

Craig N. Killen  
Frank B.B. Knowlton  
Jeremy C. Whitley  
Nelson, Mullins, Riley & Scarborough LLP  
1320 Main Street, 17<sup>th</sup> Floor  
Columbia, SC 29201  
Telephone: (803) 799-2000  
Facsimile: (803) 256-7500  
craig.killen@nelsonmullins.com  
frank.knowlton@nelsonmullins.com  
jeremy.whitley@nelsonmullins.com  
*Counsel for Verian Technologies, Inc.*



\_\_\_\_\_  
Gregory N. Stillman